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*Attorneys for Defendants,
Francine Magliarditi, individually and as
Trustee of the FRM Trust, DJM Irrevocable Trust, and
FANE Trust, ATM Enterprises, LLC, DII Capital, Inc.
DFM Holdings, Ltd., DFM Holdings, LP,
and DII Properties LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * *

TRANSFIRST GROUP, INC. f/k/a
TRANSFIRST HOLDINGS, INC.,
TRANSFIRST THIRD PARTY SALES LLC
f/k/a TRANSFIRST MERCHANT
SERVICES, INC., and PAYMENT
RESOURCES INTERNATIONAL, LLC,

Plaintiff,

vs.

DOMINIC J. MAGLIARDITI; FRANCINE
MAGLIARDITI; in her individually capacity,
and as trustee of FRM TRUST, DJM
IRREVOCABLE TRUST, and the FANE
TRUST; ATM ENTERPRISES, LLC; DII
CAPITAL, INC.; DFM HOLDINGS, LTD;
DFM HOLDINGS, LP, DII PROPERTIES
LLC; MAGLIARDITI, LTD.;
CHAZZLIVE.COM, LLC; and SPARTAN
PAYMENT SOLUTIONS, LLC.

Defendants.

Case No.: 2:17-CV-00487-APG-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME IN WHICH TO
ANSWER, MOVE OR OTHERWISE
RESPOND
(First Request)**

COMES NOW, Defendants Francine Magliarditi; FRM Trust; DJM Irrevocable Trust;
Fane Trust; ATM Enterprises, LLC; DII Capital, Inc.; DFM Holdings, Ltd., DFM Holdings, LP;
and DII Properties, LLC ("Defendants") file this Unopposed Motion for Extension of Time in
Which to Answer, Move or Otherwise Respond and, in support thereof, would show unto the
Court as follows:

1 1. The above-entitled action was received by the Court from the Northern District of
2 Texas on February 15, 2017 pursuant to a court order (ECF No. 37). The Court has ordered
3 (ECF No. 39) that all non-resident counsel file a Verified Petition, Motion for Permission to
4 Practice in This Case Only by April 2, 2017. The Court has further ordered (ECF No. 39) that
5 counsel shall have until March 18, 2017 to file a Joint Status Report.

6 2. Defendants have recently retained the undersigned attorneys to act as their counsel
7 in this matter and their Notice of Appearance (ECF No. 41) was filed on March 2, 2017, and
8 counsel needs additional time to consider the relevant defenses and the appropriate course of
9 action in response to Plaintiffs' Amended Complaint.

10 3. Counsel for Plaintiffs has agreed that Defendants may have a two (2) week
11 extension from March 18, 2017, in which to answer, move or otherwise respond to Plaintiffs'
12 Amended Complaint, and is not opposed to this motion.

13 4. This is the first request for an extension of time in which to answer, move or
14 otherwise respond to Plaintiffs' Amended Complaint.

15 5. The additional time requested herein is not sought for purposes of delay.
16 THEREFORE, Defendants request that the Court enter an Order granting their Motion
17 and that the Defendants have two (2) weeks from March 18, 2017 to answer, move or otherwise
18 respond to Plaintiffs' Amended Complaint.

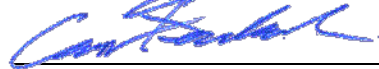
19 DATED this 6th day of March, 2017.

20 BAILUS COOK & KELESIS, LTD.

21 /s/ Mark B. Bailus
22 MARK B. BAILUS, ESQ.
23 Nevada Bar No. 2284
24 517 S. Ninth Street
25 Las Vegas, Nevada 89101
26 Attorneys for Defendants

25 IT IS SO ORDERED.

26 UNITED STATES MAGISTRATE JUDGE

27 

28 DATED: 3-6-2017